

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Consolidated Action: Lead Case]

**LULAC PLAINTIFFS'
DESIGNATION OF TESTIFYING EXPERTS**

Pursuant to Federal Rule of Civil Procedure 26(a)(2) and the Court's December 17, 2021 Scheduling Order, Dkt. 96, as amended by the Joint Stipulation Modifying Expert Deadlines, Dkt. 268, Plaintiffs League of United Latin American Citizens, Southwest Voter Registration Education Project, Mi Familia Vota, American GI Forum, La Union Del Pueblo Entero, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, William C. Velasquez Institute, FIEL Houston Inc., Texas Association of Latino Administrators and Superintendents, Proyecto Azteca, Reform Immigration for Texas Alliance, Workers Defense Project, Emelda Menedez, Gilberto Menendez, Jose Olivares, Florinda Chavez, Joey Cardenas, Paulita Sanchez, Jo Ann Acevedo, David Lopez and Jeandra Ortiz (hereinafter, the "LULAC Plaintiffs"), hereby file their designation of testifying experts.

Designation of Testifying Experts

1. **Dr. Andrés Tijerina.** Dr. Tijerina is a Professor Emeritus of U.S. History at Austin Community College. Dr. Tijerina is expected to provide testimony regarding the history of racial discrimination against Latinos in Texas.
2. **Dr. Henry Flores.** Dr. Flores is a Professor Emeritus of Political Science in the Department of Political Science at St. Mary's University. Dr. Flores is expected to provide testimony regarding racial discrimination in the enactment of the challenged redistricting plans.
3. **Dr. Jacob (Jake) M. Grumbach.** Dr. Grumbach is an Assistant Professor of Political Science at the University of Washington. Dr. Grumbach is expected to provide testimony regarding racially polarized voting in Texas.
4. **Dr. Rogelio Sáenz.** Dr. Sáenz is a Professor of Demography at the University of Texas at San Antonio. Dr. Sáenz is expected to testify regarding Latino demographic characteristics and the present day effects of discrimination on Latinos in Texas.
5. **Dr. Cristina Morales.** Dr. Morales is a Professor of Sociology and Anthropology at the University of Texas at El Paso. Dr. Morales is expected to testify regarding characteristics of the population that resides in LULAC Plaintiffs' proposed remedial districts.
6. **Dr. Luis Fraga.** Dr. Fraga is a Professor of Political Science, Director of the Institute for Latino Studies, and Fellow at the Institute for Educational Initiatives at the University of Notre Dame. Dr. Fraga is expected to testify regarding Latino voter registration and turnout in Texas and sociological factors that influence Latino political participation.

Additionally, pursuant to the Court's December 17, 2021 Scheduling Order, Plaintiffs shall on this day serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B). Dkt. 96.

DATED: May 20, 2022

s/ Nina Perales

Nina Perales
Texas Bar No. 24005046
Samantha Serna
Texas Bar No. 24090888

Fátima Menendez
Texas Bar No. 24090260
Kenneth Parreno*
Massachusetts Bar No. 705747
MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205
(210) 224-5476

Admitted *pro hac vice

Denise Hulett*
California Bar No. 121553
MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND
1512 14th Street
Sacramento, CA 95814
(916) 444-3031

Admitted *pro hac vice

ATTORNEYS FOR LULAC PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 20th day of May 2022.

/s/ Nina Perales
Nina Perales